3-10-04

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MAVERICK CONSTRUCTION CORP., Plaintiff, v. Civil Action No.: 03-CV-12537 (WGY) **BUILDING AND CONSTRUCTION** TRADES COUNCIL OF BOSTON: LOCAL 103, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS; and LOCAL 223, LABORERS INTERNATIONAL UNION Dispositive Motions due OF NORTH AMERICA, Defendants.

FEDERAL RULE 26(f) REPORT AND JOINT STATEMENT OF THE PARTIES

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Rule 16.1(D) of the Local Rules for the District of Massachusetts, the parties in the above-captioned action hereby certify that they have conferred and state the following matters for the Court's consideration at the Scheduling Conference for this matter on March 15, 2004.

A. Joint Discovery/Motion and Litigation Plan

For discovery, motions and general litigation, the parties propose the following schedule:

- March 15, 2004: Initial disclosures shall have been made pursuant to Fed. R. Civ. 1. P. 26(a)(1) and Local Rule 26.2(A), and fact discovery shall commence.
 - 2. July 30, 2004: Fact discovery shall conclude.
 - 3. September 17, 2004: Summary judgment motions shall be filed.
 - November 29, 2004: Final pre-trial conference; entry onto running trial list. 4.

B. Resolution by Magistrate/Mediation/ADR Program

The parties do not agree to mediation, ADR, or trial before a Magistrate Judge at this time.

C. <u>Certifications</u>

Certifications signed by counsel and an authorized representative of each party pursuant to Local Rule 16.1(D)(3) have been or are being filed directly by the parties.

Respectfully submitted on this _______day of March, 2004.

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